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Attorneys for Plaintiff
Old Republic Insurance Company

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

**OLD REPUBLIC INSURANCE
COMPANY, a Pennsylvania corporation.**

Plaintiff

vs.

CITY PLAN DEVELOPMENT, INC. dba
SAVI CONSTRUCTION, a Nevada
corporation; and ERNESTO J. SAVINO
and CYNTHIA WILSON aka CYNTHIA
SAVINO, Nevada individuals and
individually and as husband and wife,

Defendants

No. 2:16-cv-00903

**STIPULATED MOTION TO
CONTINUE BRIEFING SCHEDULE
IN RESPONSE TO OCTOBER 26,
2016 ORDER TO SHOW CAUSE**

(Third Request)

Pursuant to LR 6-1, Old Republic Insurance Company (“Old Republic”) and Defendants City Plan Development, Inc. dba Savi Construction, Ernesto J. Savino and Cynthia Wilson aka Cynthia Savino (collectively “Defendants”), through their respective undersigned counsel, hereby stipulate and agree to extend the deadline for Old Republic to respond to the Court’s Order to Show Cause [ECF No. 60; filed on October 26, 2016] until December 30, 2016. Consistent with the Court’s Order to Show Cause, Defendants shall

1 have seven days thereafter to file their response. No reply shall be filed.
2

3 The parties continue to discuss a possible resolution of Old Republic's claims against
4 Defendants and Defendants' claims against Old Republic that would result in a dismissal of
5 this action, and the proposed extension of time will provide the parties with additional time
6 to complete their settlement discussions before incurring additional attorneys' fees and using
7 the Court's time and resources. A proposed form of Order is submitted herewith.

8 Dated this 29th day of November, 2016.
9

10 **JENNINGS, STROUSS & SALMON, PLC**
11

12 By: /s/ Patrick F. Welch
13

14 Patrick F. Welch (Nevada Bar No. 13278)
15

16 One East Washington, Suite 1900
17

18 Phoenix, Arizona 85004-2554
19

20 *Attorneys for Plaintiff Old Republic Insurance
Company*

21 **SHUMWAY VAN**
22

23 By: /s/ Brent D. Huntley (with permission)
24

25 Michael C. Van, Esq. (Nevada Bar No. 3876)
26

27 Brent D. Huntley, Esq. (Nevada Bar No. 12405)
28

8985 S. Eastern Avenue, Suite 100
9

9 Las Vegas, Nevada 89123
10

11 *Attorneys for Defendants*

12 **CERTIFICATE OF SERVICE**
13



15 I hereby certify that on November 29, 2016, I electronically transmitted the attached
16 document to the Clerk's Office using the CM/ECF System for filing on all attorneys
17 of record and any nonparties who have requested notice.
18



20 I hereby certify that on _____, I served the attached document by mail on
21 the following, who are not registered participants of the CM/ECF System:
22

23 By /s/ A. Saldivar
24

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3
4
5 **IN THE UNITED STATES DISTRICT COURT**
6 **FOR THE DISTRICT OF NEVADA**
7

8 OLD REPUBLIC INSURANCE
9 COMPANY, a Pennsylvania corporation,
10

11 Plaintiff
12

13 vs.
14

15 CITY PLAN DEVELOPMENT, INC. dba
16 SAVI CONSTRUCTION, a Nevada
17 corporation; and ERNESTO J. SAVINO
18 and CYNTHIA WILSON aka CYNTHIA
19 SAVINO, Nevada individuals and
20 individually and as husband and wife,
21

22 Defendants

23 No. 2:16-cv-00903

24 **ORDER GRANTING STIPULATED
25 MOTION TO CONTINUE BRIEFING
26 SCHEDULE IN RESPONSE TO
27 OCTOBER 26, 2016 ORDER TO
28 SHOW CAUSE**

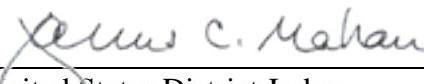
(Third Request)

16 Pursuant to the parties' Stipulated Motion to Continue Briefing Schedule in
17 Response to the Court's October 26, 2016 Order to Show Cause ("Order"), and good cause
18 appearing therefor;

19 IT IS HEREBY ORDERED that the time for Plaintiff Old Republic Insurance
20 Company to file its response to the Court's Order [ECF No. 60; filed on October 26, 2016]
21 (currently due November 30, 2016) is continued to December 30, 2016.

22 IT IS HEREBY FURTHER ORDERED that Defendants shall have seven days
23 thereafter to file a response. No reply shall be filed.
24

25 Dated December 13, 2016.

26 
27 _____
28 United States District Judge